

Bryan Reo

From: Bryan Reo
Sent: Thursday, September 22, 2022 1:02 PM
To: Raymond Vasvari
Subject: RE: Reo v Reynaud [Discovery Concerns and pending motion for Protective Order]

We are at the 1:00pm 22 September 2022 deadline provided for the protective order motion.

I am going to go to the gunsmith and then go hike in a park, I will likely wait 2-3 hours and will wait to see if I have an email from you, confirming for me that you are withdrawing

INTERROGATORY NO. 11

Please identify every person with whom you have had a romantic, sexual or erotic relationship, which relationship terminated at any point in the last five years, including relationships conducted in whole or in part online.

INTERROGATORY NO. 15

Please identify every person with whom you have consulted, or by whom you have been seen, counseled, or treated for any mental illness, emotional disturbance, addiction, substance abuse or other mental health issue at any point since you were aged 18.

INTERROGATORY NO. 16

Please identify with particularity any diagnosis you have received for any mental illness, emotional disturbance, addiction, substance abuse or other mental health issue at any point since age 18. Identification shall consist in disclosing: (a) the diagnosis; (b) the date of the diagnosis, and; (c) the person or persons by whom the diagnosis was made.

INTERROGATORY NO. 18

Please identify every drug or remedy prescribed for you in connection with any condition identified in response to Interrogatory No. 16 above.

REQUEST FOR PRODUCTION NO. 39

Your current health insurance policy, and all such policies in effect during the last five years, along with any group, plan or membership numbers, and identity or insurance cards.

REQUEST FOR PRODUCTION NO. 40

Please produce HIPPA compliant releases authorizing the disclosure to undersigned counsel of your medical and mental health treatment records, including the notes of any mental health care provider. Applicable form releases are provided for providers associated with the Cleveland Clinic, University Hospitals and MetroHealth care systems.

REQUEST FOR PRODUCTION NO. 42

Any and all records of your having been involuntarily admitted to any hospital, psychiatric or mental health care facility, or having been to psychiatric evaluation at the request of any police or law enforcement agency.

REQUEST FOR PRODUCTION NO. 55

Every diary, journal, record, memoir or other periodic record of your thoughts, activities, emotions, impressions, reflections moods, and/or mental state in which any entry has been made during the last five years.

REQUEST FOR PRODUCTION NO. 56

All records, notes, treatment records, appointments, appointment reminders, prescriptions or communications to, from, with or relating to anyone who provide you with mental health treatment or services during the relevant period, including without limitation any psychiatrist, psychologist, therapist, social worker, licensed clinical social worker, supervising licensed clinical social worker, or clergy member, which reflect treatment or services within the last ten years.

REQUEST FOR PRODUCTION NO. 57

All records, notes, treatment records, appointments, appointment reminders, prescriptions or communications to, from, with or relating to anyone who provide you with substance abuse and/or addiction treatment or services during the last ten years, including without limitation any psychiatrist, psychologist, therapist, social worker, licensed clinical social worker, supervising licensed clinical social worker, or clergy member.

If they are withdrawn by the time I am back from the gunsmith, the hike in the park, and my afternoon shower and meal, I will consider the protective order matter moot, otherwise I will have to file it.

Judicial economy is such that you get 14 days to brief opposition, which would take us into the end of the first week of October, placing it in front of the magistrate or the judge for a possible ruling at the status conference or the motion hearing the week of October 12, setting us in the right spot for my discovery responses due on or around October 17 and the depo following soon after. So the motion basically has to go in today, to be on track for timely attention ahead of the conference and the discovery/depo deadlines.

Sincerely,

Bryan Reo

From: Raymond Vasvari <vasvari@vasvarilaw.com>

Sent: Thursday, September 22, 2022 12:59 PM

To: Bryan Reo <reo@reolaw.org>

Subject: Re: Reo v Reynaud [Discovery Concerns and pending motion for Protective Order]

I will get on finalizing this, but I have prioritized the other outstanding things you have asked for.

Yours sincerely,

Raymond V. Vasvari, Jr.

Vasvari | Zimmerman
attorneys & counselors-at-law

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